COMMENTS CRITICAL OF THE
DRAFT EPA ETS POLICY GUIDE
(Filed with EPA in Docket EPA/400/6-90/004)

NAME

John R. Myers
477 Maple Circle Drive
Cincinnati, OH 45346

DATE: 7/18/90

COMMENTS:

Myers calls the determination that 3800 Americans died from second-hand smoke last year the result of "vague, statistically cooked numbers." He requests to have a list of the 3800 people sent to him. He goes on to blast drug-addicts for not paying taxes while smokers do and then claims that there can be no justification for limiting the rights of cigarette smokers. Finally, Myers demands, "Please get to work on issues with more substance and leave this puny smoking issue in the hands of the local people, where it belongs."

NAME

John M. Dumais
President & CEO
New Hampshire Retail Grocers Association
110 Stark Street
Manchester, NH 03101

DATE: None

COMMENTS:

Dumais is concerned that EPA regulations currently under consideration are unnecessarily restrictive. He claims most New Hampshire businesses would find it "impossible and cost prohibitive" to maintain separately ventilated rooms. He mentions the National Institute of Occupational Safety and Health's (NIOSH) finding that tobacco smoke is responsible for only 2% of building complaints while ventilation problems are responsible for over 50%. Finally, he accuses EPA of "jumping to conclusions" before the facts are in.

2501053379

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

Ronald D. Utt
Vice President
National Chamber Foundation
1615 H Street, N.W.
Washington, D.C. 20062

DATE: 8/21/90

COMMENT:

Utt writes to express concern about the process by which EPA has conducted recent studies resulting in the Guide and other publications. He cites the risk assessment's "exclusive and selective reliance on research conducted outside the EPA's otherwise vigorous scientific control procedures" and publication of the report prior to public or expert review. His chief concern is the report's "exclusive reliance on secondary studies, including several critical ones that were conducted outside the United States in cultures and environments substantially different from those that prevail domestically."

NAME

Prof. Dr. H. Magnussen
Krankenhaus GroBhansdorf
Zentrum Für Pneumologie Und Thoraxchirurgie
Landersversicherungsanstalt Freie und
Hansestadt
Hamburg

DATE: 8/21/90

COMMENTS:

Magnussen writes to supply a copy of a manuscript entitled "Pediatric Pulmonology." Magnussen's data reveal that he and his colleagues were unable to document an adverse effect of acute passive smoking on lung function and/or airway responsiveness. Magnussen's comment is primarily in response to EPA's statement on the health effects of ETS in asthmatics.

2501053380

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

Milton Meckler, ME
President
Meckler Engineers Group
17525 Ventura Blvd., Suite 307
Encino, CA 91316-3871

DATE: 8/27/90

COMMENT:

Meckler supplies information on constant volume and variable air volume distribution systems, and gas phase ETS in order to correct the Guide's statement linking ETS and particulate indoor air pollution. He attaches an article ("Ventilation/Air Distribution Cure Sick Buildings") which he authored from the January 1985 edition of "Specifying Engineer."

NAME

Jim Tallas
Tallas Insurance Agency
#1 Sugar Creek Center Blvd., Suite 980
Sugar Land, TX 77478

DATE: 8/29/90

COMMENT:

Tallas feels that the Guide's recommendations for businesses are unrealistic. He notes that most of the studies were conducted in residences, and that those which examined workplaces showed no adverse health effects among nonsmokers. Further, he points out that in most instances where employees complained about air quality, it was not ETS, but poor ventilation, that was named as the source of the problem. Thus, he suggests EPA focus on ventilation if it wishes to produce a useful policy guide.

2501053381

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

Wes Lane
Minnesota DRIVE
3001 University Ave., S.E.
Suite 510
Minneapolis, MN 55414

DATE: 9/11/90

COMMENT:

Lane claims EPA should expend its energy, not on ETS, but on more pressing health and environmental problems such as electronic radiation, volatile compound emissions, and microbial contamination. He criticizes the draft for only making use of studies conducted in homes.

NAME

Katie Carothers
Nashville, TN 37221

DATE: 9/25/90

COMMENT:

Carothers, a mother of three, blasts EPA for "wasting its time and the taxpayer's money" on investigating workplace smoking. She implores EPA to reassess its priorites, and concentrate on issues such as nuclear waste, polluted waters, and automobile exhaust.

2501053382

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

Rosemary Silano
195 Poudre River Road
Bellvue, CO 80512

DATE: 9/25/90

COMMENT:

Silano is against banning smoking in the workplace. She feels that adults should make their own choices about smoking, and concludes by noting that she will "enjoy an occasional cigarette whenever she chooses."

NAME

Fred Collier II
10490 Poudre Canyon
Bellvue, CO 80512

DATE: 9/25/90

COMMENT:

Collier criticizes EPA for wasting taxpayer revenues on this project. He closes by writing, "If you cannot ensure everlasting health, then at least allow us to relieve stress with the best stress buster there is. Let us enjoy a cigarette."

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

Jose F. Rodriguez
Jose Rodriguez and Associates [consultants]
1859 Helen Drive
Las Vegas, NV 89119

DATE: 9/25/90

COMMENT:

Rodriguez, President of an international consulting company, claims that to his clients around the world "what is going on in the U.S. [with regard to smokers/non-smoker rights] is a joke." He claims that workplace smoking regulations "violate all constitutional rights," and have no scientific basis. He also notes that "irrespective of any law, [he] will not ask them [his employees] to" restrict their smoking in any way.

NAME

Jose Rodriguez
President
Nevada Smokers' Rights Association
1859 Helm Drive
Las Vegas, NV 89119

DATE: 9/25/90

COMMENT:

On behalf of his organization's membership, Rodriguez attacks the draft, claiming it has "no substantive scientific basis." He is also critical of EPA for usurping OSHA's authority, placing unreasonable restrictions on small businesses, and violating the civil rights of American citizens.

2501053384

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

K. Überla, PhD, MD
Ludwig-Maximilians-Universität
Marchioninistr. 15
Postfach 70 12 60
8000 München 70
Germany

DATE: None

COMMENT:

Überla provides an extensive comment on the draft. The gist of his commentary is that most scientists outside the U.S. do not agree with the notion that passive smoking is causally linked to lung cancer. If no causal link exists, then estimations of deaths per year are meaningless. Thus, he advises that in preparing the final document EPA be much more cautious than proposed by the draft.

NAME

Michael F. Jacobs
6698 Sandywell Drive
Temperance, MI 48182

DATE: 9/27/90

COMMENT:

Jacobs, who has worked over 20 years in one of "the big three" automobile plants, feels that the draft Guide would bring about unnecessary regulations. He discusses problems faced in his plant and notes that ETS was not a problem until a local smoking ordinance was adopted by his plant.

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

David R. Jones
President
The NFIB Foundation
Suite 700
600 Maryland Avenue, SW
Washington, DC 20024

DATE: 9/27/90

COMMENT:

Jones, whose foundation co-sponsored the McGill Symposium of November 1989, suggests that EPA refrain from making policy statements on workplace smoking until research is conducted specifically on workplace exposure. He attaches the proceedings and an overview of the McGill Symposium.

NAME

Bruce Renshaw
Executive Officer
Tobacco Institute of New Zealand
P.O. Box 1582
Auckland, New Zealand

DATE: 9/27/90

COMMENT:

Renshaw submits his organization's critique of J. Reinken's paper entitled, "Through the Smokescreen." He notes that he has been advised of the submission of Reinken's paper to the EPA docket.

2501053386

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

Elia Sterling and Chris Collett
Theodor D. Sterling and Associates Ltd.
20-1507 West 12th Avenue
Vancouver, BC V6J 2E2

DATE: 9/27/90

COMMENT:

Sterling and Collett, in their extensive comment, question both the scientific and ethical grounding of the proposed policy regulations.

NAME

F. Adlkofer, Prof. Dr.
Forschungsrat
Rauchen Und Gesundheit
Wissenschaftliches Sekretariat
Konigswinterer Strasse 550
Bonn, West Germany

DATE: 9/28/90

COMMENT:

Adlkofer questions the validity of the finding that EPA's epidemiological studies show a consistent response to ETS exposure. He challenges the Guide's utilization of meta-analysis as well as the tactic of referring to dose-response assessments based on cigarette equivalents. Adlkofer encloses two tables and two papers which support his claim.

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

JoAnn Hartmangruber
P.O. Box 3373
Merced, CA 95344

DATE: 9/28/90

COMMENT:

Hartmangruber writes, "The history of cancer and of smoking does not support a conclusion that tobacco causes cancer and other diseases in humans." She concludes that the smoking issue is social one, "wrapped in scientific words." She attaches a reference list and a letter on smoking and cancer which she wrote to Senator Wilson and copied to President Bush.

NAME

Lena B. Heckman
110 E. Main Street
Tipp City, OH 45371

DATE: 9/28/90

COMMENT:

Heckman, a non-smoker, is "appalled" at EPA's attempt "to dictate to any business on their smoking policies." She suggests that if EPA must do something, the agency should concentrate its efforts on construction companies which design poor ventilation systems.

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

Donald Heckman
110 E. Main Street
Tipp City, OH 45371

DATE: 9/28/90

COMMENT:

Heckman opposes EPA's attempt to regulate workplace smoking. He claims, "EPA is falsely reporting that exposure to tobacco smoke is harmful," and calls upon EPA to reprimand building contractors whose poorly ventilated systems produce complaints.

NAME

Calvin Kuhns
E. Main Street
Tipp City, OH 45371

DATE: 9/28/90

COMMENT:

Kuhns believes "EPA is falsely reporting that exposure to tobacco smoke is harmful to those around it." He suggests EPA pressure building contractors to solve indoor air pollution problems and opposes government regulation in general.

NAME

Donald Rosebrook, PhD
EndoEnvironment, Inc.
38352 Henry Road
Prairieville, LA 70769

DATE: 9/28/90

COMMENT:

Rosebrook comments on the Guide's paragraph on benzene exposure (p. 13). He believes that the reference to ETS as a significant source of benzene is unwarranted.

2501053389

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

Philip Witorsch, MD, FACP, FCCP
George Washington University Medical Center
Washington, DC

DATE: 9/28/90

COMMENT:

Witorsch submits that with respect to the discussion of health effects of ETS, "the Guide is unbalanced, inappropriately advocative, inaccurate, selective and misleading."

NAME

Jack E. Peterson, PE, CIH, PhD
Peterson Associates
Brookfield, WI

DATE: 9/28/90

COMMENT:

Peterson comments on Chapter 5 of the Guide. He alleges that Chapter 5 is "premised on the unsupported assertion that ETS in the workplace must be eliminated completely to safeguard health." He goes on to note, "The Guide shows little understanding of the operation of proper ventilation systems in reducing exposure to ETS as well as other indoor air contaminants."

NAME

Robert D. Tollison
Duncan Black Professor of Economics
George Mason University
Fairfax, VA 22030

DATE: 9/28/90

COMMENT:

Tollison's comments center on Chapter 8 of the Guide. In general, he feels that EPA's analysis of cost saving is "flawed beyond repair."

2501053390

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

Mark J. Reasor, PhD
1153 Cambridge Avenue
Morgantown, WV 26505

DATE: 9/28/90

COMMENT:

Reasor comments at length on Chapters 1 and 2 of the Guide. He feels that both chapters are misleading and inaccurate and provides specific comments on each.

NAME

Gray Robertson
President
Healthy Buildings International, Inc.
Fairfax, VA

DATE: 9/28/90

COMMENT:

Robertson's company expresses disappointment over the Guide for its lack of balance and objectivity.

NAME

Alan Hedge, PhD
Cornell University
Ithaca, NY 14853

DATE: 9/29/90

COMMENT:

Hedge provides detailed comments on the Guide's sections on air monitoring (p. 12), health effects of ETS (Chapter 3), and reducing exposure to ETS (Chapter 5). He notes that results of his recent research project on the effects of alternative smoking policies on indoor air quality will soon be available.

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

Theodore Sterling, PhD
School of Computing Science
Simon Fraser University
Burnaby, BC V5A 1S6

DATE: 10/1/90

COMMENT:

Sterling feels that the Guide is based upon health and exposure claims regarding ETS. He suggests that EPA host a workshop to fully explore ETS health and exposure issues and notes that he will comment on the draft risk assessment.

NAME

Frances Blakeslee
Roy, VT 84067

DATE: 10/1/90

COMMENT:

Blakeslee alleges that "EPA is conducting a very biased study of the effects of tobacco smoke," and criticizes the agency for not publicizing the public comment period adequately.

NAME

Larry C. Holcomb
Holcomb Environmental Services
17375 Garfield Road
Olivet, WI 49076

DATE: 10/1/90

COMMENT:

Holcomb writes that mortality risk from ETS as reported by EPA has no scientific value because it is not based on the principles of risk assessment. He claims that EPA's dose-response modeling is "highly suspect," and that there is no evidence of adverse health impacts to either children or adults from ETS exposure. Holcomb feels that the Guide is filled with erroneous statements due to assumptions carried over from the draft risk assessment.

2501053392

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

Frank Powell
Director of Engineering
National Energy Management Institute
601 North Fairfax Street
Suite 160
Alexandria, VA 22314

DATE: 10/1/90

COMMENT:

Powell comments on assessment and ventilation issues with regard to both the Guide and the risk assessment. He believes that the Guide does not present a balanced approach to the alternatives available to building and business owners.

NAME

Leonard S. Levy, MD
The University of Birmingham
Institute of Occupational Health
Edgbaston
Birmingham B15 2TT
UK

DATE: 10/1/90

COMMENT:

Levy criticizes the Guide for its advocative tone and scientific inaccuracy. He provides a six point list of criteria to consider in preparing any guide for a lay audience on a scientific and social issue.

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

George B. Leslie, MRC, Path
Bioassay
2 Ivel Gardens
Biggleswade
Beds. SG 18 OAN
England, UK

DATE: 10/1/90

COMMENT:

Leslie comments on the risk assessment, concluding that EPA's finding that ETS is a known human carcinogen is fallacious. He challenges EPA's conclusion primarily on the basis of the notion that epidemiological studies alone cannot establish causality.

NAME

Trent R. Lewis, PhD
Cincinnati, OH

DATE: 10/1/90

COMMENT:

Lewis concludes that the Guide relies upon inadequate data to make the incorrect policy statement that prohibition of workplace smoking would solve indoor air quality problems.

NAME

Guy Crepat
Professor of Biochemistry and Physiology
Institut Universitaire de Technologie
University of Burgundy
21000 Dijon, France

DATE: 10/1/90

COMMENT:

Crepat points out several flaws in the statistical methodology employed in EPA's documents on ETS. He comments on several sections of the risk assessment and suggests a review of Viala's paper entitled, "Rapports Eventuels Entre Tabagisme Passif Et Cancer Du Poumon: Parametres A Prendre En Consideration," which summarizes the parameters to be considered in epidemiological studies. A copy of Viala's study is attached.

2501053394

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

Robert T. Johnson
Senator, 8th District
Room 226
Capitol Building
Jefferson City, MO 65101

DATE: 10/1/90

COMMENT:

Johnson considers the Guide "more unnecessary regulation of small and medium-sized businesses which can ill afford the ensuing loss of worker productivity and morale that will be engendered by EPA action."

NAME

Jimmy Naifeh
Majority Leader
TN House of Representatives
18A Legislative Plaza
Nashville, TN 37219

DATE: 10/1/90

COMMENT:

Naifeh writes to oppose issuance of workplace smoking regulations in general.

NAME

Tommy Irvin
Commissioner
Georgia Department of Agriculture
Capitol Square
Atlanta, GA 30334

DATE: 10/1/90

COMMENT:

Irvin claims the Guide appears to be based upon incomplete research. He is concerned primarily about two issues. One, he notes that there is not enough consideration given to customers and clients who enter places of business in the Guide. Two, he feels that the Guide does not give proper emphasis to providing workplace accommodations for both smokers and non-smokers.

2501053395

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

Alan Slobodin
Washington Legal Foundation
1705 N Street, NW
Washington, DC 20036

DATE: 10/1/90

COMMENT:

The organization and a number of U.S. Representatives comment "to express deep reservations regarding numerous aspects" of the draft Guide. In light of various scientific and legislative considerations, the Foundation requests IAD withdraw the proposed Guide at least until SAB review of the risk assessment has occurred.

NAME

Paul Magaril
Vice President for Government Affairs
New York Chamber of Commerce and Industry, Inc.
90 South Swan Street
Albany, NY 12210

DATE: 10/1/90

COMMENT:

Magaril's organization feels that either separate ventilation systems or smoking prohibitions "would impose enormous burdens on business." The organization does not feel that the available evidence on ETS warrants such "radical" approaches as the separate ventilation and smoking prohibition options. The organization criticizes the draft for selective use of studies and reliance on data collected from studies of ETS in the home, as opposed to the workplace.

2501053396

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

Joe E. Yates
Senator, 1st District
1812 Clark
Bentonville, AS 72712

DATE: 10/2/90

COMMENT:

Yates writes to oppose "EPA's attempt to preempt the state and OSHA on workplace issues." He feels that the regulations set forth in the Guide would unnecessarily intrude on small and medium-sized businesses.

NAME

Tommy Haun
Representative
8th Legislative District
202 War Memorial Building
Nashville, TN 37219

DATE: 10/2/90

COMMENT:

Haun expresses opposition to the proposed Guide. He feels that smoking policies should be determined by the employees of a particular work site, and not by the federal or state government.

2501053397

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

James R. White
Commissioner
State of Tennessee
Department of Labor
501 Union Building
Nashville, TN 37243

DATE: 10/2/90

COMMENT:

White offers five brief comments on the Guide. First, he feels that OSHA, not EPA, retains statutory authority for regulating workplace air quality. Second, the draft's methods for controlling ETS levels are not feasible in most workplaces. Third, he believes smoking policies should be set by cities and states, not by the federal government. Fourth, he contends the draft was prepared by individuals with the predetermined opinion that workplace smoking should be eliminated. Fifth, he claims that no consideration is given to the economies of the tobacco producing states.

NAME

Scott Moore
Senator
District No. 24
State Capitol
P.O. Box 24
Lincoln, NE 68509

DATE: 10/2/90

COMMENT:

Moore is surprised that EPA is exploring workplace smoking issues. He urges EPA to concentrate future efforts on the improvement of ventilation systems.

2501053398

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

Arthur Wilcox, Jr.
Chairman
New York Committee for Occupational Safety and Health
275 Seventh Avenue
New York, NY 10001

DATE: 10/2/90

COMMENT:

Wilcox, on behalf of his organization and the union members it represents, characterizes the Guide as "an overly simplistic answer" to the problem of indoor air pollution. He urges EPA not to publish the document.

NAME

Gary Maxey
State Representative
District 40
State Capitol
Room 333
Oklahoma City, OK 73105

DATE: 10/3/90

COMMENT:

Maxey feels EPA's conclusions are not scientifically sound and that adoption of the Guide would mean unnecessary regulation of small businesses.

NAME

W. Owen Elmer
Senator
District No. 38
Box 216
Indianola, NE 69034

DATE: 10/2/90

COMMENT:

Elmer suggests that EPA concentrate on contaminants common to most businesses such as electronic radiation, volatile substances, and bacterial problems.

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

John S. Wilder
Lieutenant Governor
State of Tennessee
Suite One
Legislative Plaza Building
Nashville, TN 37243

DATE: 10/2/90

COMMENT:

Wilder feels that decisions as to where individuals can and cannot smoke "should be made by the legislative branch of government, not by some agency."

NAME

William C. McBrayer
President
Georgia Retail Association
100 Edgewood Avenue, NE
Suite 1804
Atlanta, GA 30303

DATE: 10/2/90

COMMENT:

McBrayer criticizes the draft Guide for failing to give adequate consideration to smoking customers and clients who enter workplaces. He also feels there is a lack of emphasis on accommodating both smokers and non-smokers in the workplace.

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

Charles Brown
Representative
District 11A
State Office Building
St. Paul, MN 55155

DATE: 10/3/90

COMMENT:

Brown feels that the Guide's review of ETS problems is scientifically flawed, and urges EPA to address the "overall health problems in the workplace, before issuing premature policies. . . ."

NAME

Barbara Gronemus
State Representative
91st Assembly District
105 West State Capitol
P.O. Box 8952
Madison, WI 53708

DATE: 10/5/90

COMMENT:

Gronemus criticizes the Guide in a general way, and urges EPA to redirect its efforts from ETS to other "real health concerns."

NAME

Kathleen L. Wojcik
State Representative - 45th District
514 Wise Road
Schaumburg, IL 60193

DATE: 10/9/90

COMMENT:

Wojcik suggests that EPA cease publication of the Guide until it can issue a guide which addresses all problems associated with indoor air pollution.

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

Colin and Yvonne Hester
Belmont, CA 94002

DATE: 10/10/90

COMMENT:

The Hesters question EPA's credibility and consider the Guide an irresponsible publication.

NAME

Riley C. Darnell
Senator
101 South Third Street
Clarksville, TN 37040

DATE: 10/9/90

COMMENT:

Darnell requests that EPA refrain from issuing workplace smoking policy guidelines. He feels that such policies should be determined by the employer and employees of any given workplace.

NAME

R.C. Brown
MRC Toxicology Unit
Woodmansterne Road
Carshalton, Surrey SM5 4EF

DATE: 10/15/90

COMMENT:

Brown writes to comment on the policy implications of acceptance of the EPA draft. With regard to respiratory disorders in children, Brown feels that "there is enormous scope for more studies on these possibilities and conclusions are not possible at this point." He provides eight comments on the directions in which further research might lead and on the problems that acceptance of the draft might create.

2501053402

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

Jack M. Head
President
Head Distributing Co.
4828 North Church Lane
Smyrna, GA 30080

DATE: 10/5/90

COMMENT:

Head finds the Guide unfair to smokers and encourages EPA to look into developing incentives to promote adequate ventilation in workplaces.

NAME

L.H. Ivy
Commissioner
Tennessee Department of Agriculture
Nashville, TN 37204

DATE: 10/9/90

COMMENT:

Ivy notes that the shaping of workplace smoking policy is an employer/employee issue.

NAME

Ernest Newton
State of Connecticut
House of Representatives
State Capitol
Hartford, CT 06106

DATE: 10/10/90

COMMENT:

Newton encourages EPA to abandon publication of the Guide.

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

Gene C. Royalty
Secretary
Commonwealth of Kentucky
Cabinet for Economic Development
Capital Plaza Office Tower
Frankfort, KY 40601

DATE: 10/11/90

COMMENT:

Royalty expresses the opinion that OSHA, not EPA, should be responsible for determining workplace smoking regulations.

NAME

Elias Ackal, Jr.
State of Louisiana
House of Representatives
P.O. Box 13408
New Iberia, LA 70562

DATE: 10/15/90

COMMENT:

Ackal is generally critical of the Guide. He concludes that a better guide might focus on the problems associated with poor ventilation.

NAME

Frank D. Barrows
State of Connecticut
Senate
State Capitol
Hartford, CT 06106

DATE: 10/18/90

COMMENT:

Barrows criticizes the Guide because its provisos do not include cost efficient alternatives for businesses, and because its scientific basis is questionable.

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000

POLICY GUIDE PUBLIC COMMENTS (Continued)

NAME

Dale J. Venturini
President
Rhode Island Hospitality Association
P.O. Box 6208
Providence, RI 02940

DATE: 10/18/90

COMMENT:

Venturini's association feels that the Guide is premature in that it does not fully review workplace ETS exposure studies. The Association urges EPA to ultimately develop a realistic ETS policy "that is sensitive to the position of our businesses, employees, and customers."

Source: https://www.industrydocuments.ucsf.edu/docs/hxwk0000